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### FINDLAW DAILY OPINION SUMMARIES U.S. 1ST CIRCUIT COURT OF APPEALS

Administrative Law, Government Benefits, Health Law

#### **Maine Medical Center v. Burwell, No. 14-1557**

Judgment upholding the decision of the Secretary for the Department of Health and Human Services denying plaintiff's claim for partial federal reimbursement of medical services "bad debt" for two fiscal years is affirmed, where it was not arbitrary and capricious for the Secretary to demand that plaintiff provide documentation from the State in the form of state-issued remittance advice, nor was it arbitrary and capricious to deny the reimbursement claims that were unsupported by such documentation.

Criminal Law & Procedure, Habeas Corpus, Sentencing

#### **Butterworth v. US, No. 14-1076**

In this case, defendant was convicted and sentenced on federal charges arising from his involvement in a crack-cocaine distribution operation. Denial of defendant's motion for habeas relief is affirmed, where the rule announced by the Supreme Court in *Alleyne v. United States* (that any fact leading to the imposition of a mandatory minimum sentence must be found by a jury beyond a reasonable doubt) does not apply retroactively to sentences challenged on an initial petition for collateral review, as here.